

# **EXHIBIT I.22**

1                   IN THE UNITED STATES DISTRICT COURT  
 2                   FOR THE NORTHERN DISTRICT OF OHIO  
 3                   EASTERN DIVISION

4                                 -   -   -

5  
 6           IN RE:   NATIONAL                                 :     MDL NO. 2804  
 7           PRESCRIPTION OPIATE                                 :  
           LITIGATION                                                 :  
                                                                                :

8           -----  
 9           THIS DOCUMENT RELATES TO                         :   CASE NO.  
           ALL CASES                                                 :   1:17-MD-2804  
                                                                                :  
                                                                                :   Hon. Dan A.  
 10                                                                                 :   Polster

11                                 -   -   -

12                                 February 8, 2019

13                                 -   -   -

14                   HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
 15                   CONFIDENTIALITY REVIEW

16                                 Continued videotaped deposition  
 17           of CHRISTOPHER ZIMMERMAN taken pursuant to notice,  
           was held at the law offices of Reed Smith LLP, Three  
           Logan Square, 1717 Arch Street, Suite 3100,  
 18           Philadelphia, Pennsylvania, beginning at 1:44  
           p.m., on the above date, before Ann Marie  
 19           Mitchell, a Federally Approved Certified Realtime  
           Reporter, Registered Diplomate Reporter,  
 20           Registered Merit Reporter and Notary Public.

21                                 -   -   -

22                                                                                 -   -   -  
 23                                 GOLKOW LITIGATION SERVICES  
                                877.370.3377 ph | 917.591.5672 fax  
                                                                                deps@golkow.com

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1           Q.       Have you ever discussed the  
2       quotas with any of your manufacturer clients or  
3       customers?

4           A.       Not that I -- not that I know of.  
5       We -- you know, as a distributor, we don't deal  
6       with -- I mean, we're not involved in quotas.

7           Q.       How about, have you ever heard of  
8       getting an allocation of a manufacturer's quota  
9       for distribution?

10          A.       I'm not sure -- I know we get  
11       allocated product on short supply items. I'm not  
12       sure if that's what you're referencing.

13          Q.       Have you ever like, for example,  
14       applied to get a certain percentage of the  
15       distribution of Schedule II controlled substances  
16       manufactured by like Purdue?

17          A.       I wouldn't know that.

18          Q.       Who would know that?

19          A.       If it's a purchasing or  
20       procurement, then it would be that -- global  
21       sourcing is the name of the department that does  
22       all the buying for the company.

23          Q.       Item number 2 here says, "DEA  
24       issued registrations to pill mills that 'popped